

EXHIBIT C

affidavits of equal dependency and
distribution

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

JANET GODINEZ, on behalf of herself and
as administrator to the estate of her brother,
HERIBERTO GODINEZ, Deceased,

Plaintiff,

vs.

The CITY OF CHICAGO, et al.,

Defendants.

16 CV 7344

Judge ROWLAND

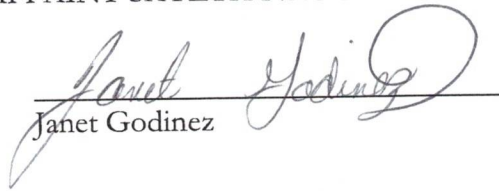
**AFFIDAVIT OF JANET GODINEZ OF EQUAL DEPENDENCY
AND DISTRIBUTION OF SETTLEMENT FUNDS**

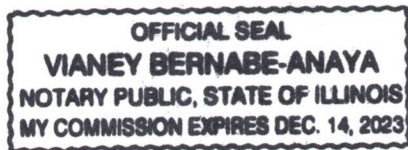
I, Janet Godinez., being duly sworn under oath, states the following:

1. I am of legal age and competency.
2. HERIBERTO GODINEZ Jr. was my brother.
3. HERIBERTO GODINEZ Jr., died leaving five heirs: Heriberto Godinez, Sr. (his father), Ofelia Godinez (his mother), Janet Godinez (his sister), Crystal Godinez (his sister), and Juan Godinez (his brother).
4. I am one of the heirs and beneficiaries of Heriberto Godinez's estate.
5. I was duly appointed the Independent Administrator of the Estate of Heriberto Godinez by the Probate Division of the Cook County Circuit Court and am the named plaintiff in the above captioned lawsuit relating to the death of my brother.
6. I was present during the settlement conference before Judge Cummings and was informed that an offer to settle was made in the amount of \$1,200,000.00. After considering the risks and costs associated with trial I agree and believe that accepting this offer is in the best interest of the heirs and the estate.
7. I agree that the dependency of each heir to Heriberto Godinez are equal at 20% (or 1/5 share), and that the distribution of the proceeds after fees, costs, and liens are paid, should be divided equally between his five heirs.
8. I have reviewed the Plaintiff's Motion to Approve Settlement of Wrongful Death Cause of Action and to Approve Distribution of Funds.

9. I agree with the distribution of the settlement funds as set forth in the Motion relating to the attorney contingency fee distribution, reimbursement of the advanced costs to the attorneys, the repayment of the Oasis lien that I received to with the agreement of all heirs for the benefit of the heirs and estate, and the equal distribution to each of the five heirs.
10. I have signed this affidavit voluntarily and on my own free will.
11. All facts in this affidavit is based on my personal knowledge.

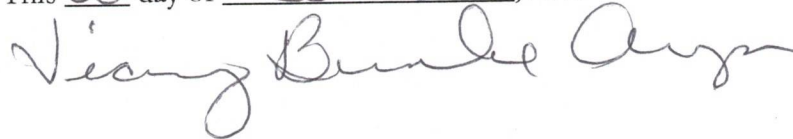
AFFAINT SAYETH NAUGHT


Janet Godinez



Subscribed and sworn to before me on

This 30 day of December, 2019



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

JANET GODINEZ, on behalf of herself and
as administrator to the estate of her brother,
HERIBERTO GODINEZ, Deceased,

Plaintiff,

vs.

The CITY OF CHICAGO, et al.,

Defendants.

16 CV 7344

Judge ROWLAND

**AFFIDAVIT OF HERIBERTO GODINEZ SR OF EQUAL DEPENDENCY
AND DISTRIBUTION OF SETTLEMENT FUNDS**

I, Heriberto Godinez, Sr., being duly sworn under oath, states the following:

1. I am of legal age and competency.
2. HERIBERTO GODINEZ Jr. was my son.
3. HERIBERTO GODINEZ, Jr., died leaving five heirs: Heriberto Godinez, Sr. (his father), Ofelia Godinez (his mother), Janet Godinez (his sister), Crystal Godinez (his sister), and Juan Godinez (his brother).
4. I am one of the heirs and beneficiaries of Heriberto Godinez's estate.
5. Janet Godinez, the administrator of the Estate, along with counsel, has kept me informed about the case throughout its duration. I was made aware that an offer to settle this matter was made in the amount of \$1,200,000.00 and agree that accepting this offer is in the best interest of the heirs.
6. I agree that the dependency of each heir to Heriberto Godinez are equal at 20% (or 1/5 share), and that the distribution of the proceeds after fees, costs, and liens are paid, should be divided equally between his five heirs.
7. I have reviewed the Plaintiff's Motion to Approve Settlement of Wrongful Death Cause of Action and to Approve Distribution of Funds.
8. I agree with the distribution of the settlement funds as set forth in the Motion relating to the attorney contingency fee distribution, reimbursement of the advanced costs to the attorneys, the repayment of the Oasis lien that I was at all times aware and approved to have been

received by Janet Godinez for the benefit of the heirs and the estate, and the equal distribution to each of the five heirs.

9. I have signed this affidavit voluntarily and on my own free will.

10. All facts in this affidavit is based on my personal knowledge.

AFFAINT SAYETH NAUGHT

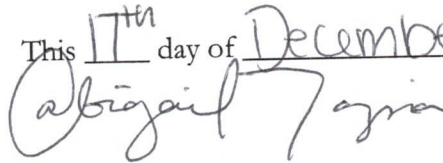


Heriberto Godinez Sr.

Subscribed and sworn to before me on

This 17th day of December, 2019





**AFFIDAVIT OF OFELIA GODINEZ OF EQUAL DEPENDENCY
AND DISTRIBUTION OF SETTLEMENT FUNDS**

1. I am of legal age and competency.
2. HERIBERTO GODINEZ Jr. was my son.
3. HERIBERTO GODINEZ, Jr., died leaving five heirs: Heriberto Godinez, Sr. (his father), Ofelia Godinez (his mother), Janet Godinez (his sister), Crystal Godinez (his sister), and Juan Godinez (his brother).
4. I am one of the heirs and beneficiaries of Heriberto Godinez's estate.
5. Janet Godinez, the administrator of the Estate, along with counsel, has kept me informed about the case throughout its duration. I was made aware that an offer to settle this matter was made in the amount of \$1,200,000.00 and agree that accepting this offer is in the best interest of the heirs.
6. I agree that the dependency of each heir to Heriberto Godinez are equal at 20% (or 1/5 share), and that the distribution of the proceeds after fees, costs, and liens are paid, should be divided equally between his five heirs.
7. I have reviewed the Plaintiff's Motion to Approve Settlement of Wrongful Death Cause of Action and to Approve Distribution of Funds.
8. I agree with the distribution of the settlement funds as set forth in the Motion relating to the attorney contingency fee distribution, reimbursement of the advanced costs to the attorneys, the repayment of the Oasis lien that I was at all times aware and approved to have been

received by Janet Godinez for the benefit of the heirs and the estate, and the equal distribution to each of the five heirs.

9. I have signed this affidavit voluntarily and on my own free will.
10. All facts in this affidavit is based on my personal knowledge.

AFFAINT SAYETH NAUGHT

Ofelia Godinez
Ofelia Godinez

Subscribed and sworn to before me on

This 12 day of December, 2019

Estefana L. Rodriguez
Notary Public



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

JANET GODINEZ, on behalf of herself and
as administrator to the estate of her brother,
HERIBERTO GODINEZ, Deceased,

Plaintiff,

VS.

The CITY OF CHICAGO, et al.,

Defendants.

16 CV 7344

Judge ROWLAND

**AFFIDAVIT OF CRYSTAL GODINEZ OF EQUAL DEPENDENCY
AND DISTRIBUTION OF SETTLEMENT FUNDS**

I, Crystal Godinez, being duly sworn under oath, states the following:

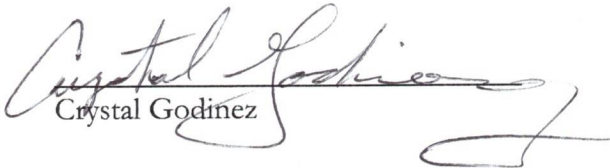
1. I am of legal age and competency.
2. HERIBERTO GODINEZ Jr. was my brother.
3. HERIBERTO GODINEZ, Jr., died leaving five heirs: Heriberto Godinez, Sr. (his father), Ofelia Godinez (his mother), Janet Godinez (his sister), Crystal Godinez (his sister), and Juan Godinez (his brother).
4. I am one of the heirs and beneficiaries of Heriberto Godinez's estate.
5. Janet Godinez, the administrator of the Estate, along with counsel, has kept me informed about the case throughout its duration. I was made aware that an offer to settle this matter was made in the amount of \$1,200,000.00 and agree that accepting this offer is in the best interest of the heirs.
6. I agree that the dependency of each heir to Heriberto Godinez are equal at 20% (or 1/5 share), and that the distribution of the proceeds after fees, costs, and liens are paid, should be divided equally between the five heirs.
7. I have reviewed the Plaintiff's Motion to Approve Settlement of Wrongful Death Cause of Action and to Approve Distribution of Funds.
8. I agree with the distribution of the settlement funds as set forth in the Motion relating to the attorney contingency fee distribution, reimbursement of the advanced costs to the attorneys, the repayment of the Oasis lien that I was at all times aware and approved to have been

received by Janet Godinez for the benefit of the heirs and the estate, and the equal distribution to each of the five heirs.

9. I have signed this affidavit voluntarily and on my own free will.

10. All facts in this affidavit is based on my personal knowledge.

AFFAINT SAYETH NAUGHT


Crystal Godinez

Subscribed and sworn to before me on

This 30 day of December, 2019

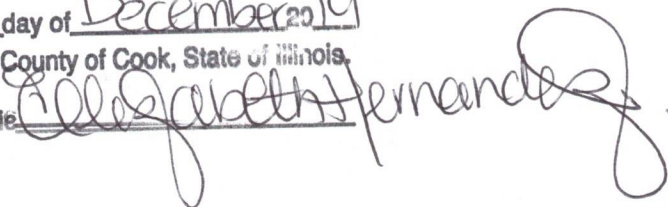


Subscribed and sworn to before me

this 30 day of December 2019

at Chicago, County of Cook, State of Illinois.

Notary Public



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

JANET GODINEZ, on behalf of herself and
as administrator to the estate of her brother,
HERIBERTO GODINEZ, Deceased,

Plaintiff,

vs.

The CITY OF CHICAGO, et al.,

Defendants.

16 CV 7344

Judge ROWLAND

**AFFIDAVIT OF JUAN GODINEZ OF EQUAL DEPENDENCY
AND DISTRIBUTION OF SETTLEMENT FUNDS**

I, Juan Godinez, being duly sworn under oath, states the following:

1. I am of legal age and competency.
2. HERIBERTO GODINEZ Jr. was my brother.
3. HERIBERTO GODINEZ, Jr., died leaving five heirs: Heriberto Godinez, Sr. (his father), Ofelia Godinez (his mother), Janet Godinez (his sister), Crystal Godinez (his sister), and Juan Godinez (his brother).
4. I am one of the heirs and beneficiaries of Heriberto Godinez's estate.
5. Janet Godinez, the administrator of the Estate, along with counsel, has kept me informed about the case throughout its duration. I was made aware that an offer to settle this matter was made in the amount of \$1,200,000.00 and agree that accepting this offer is in the best interest of the heirs.
6. I agree that the dependency of each heir to Heriberto Godinez are equal at 20% (or 1/5 share), and that the distribution of the proceeds after fees, costs, and liens are paid, should be divided equally between his five heirs.
7. I have reviewed the Plaintiff's Motion to Approve Settlement of Wrongful Death Cause of Action and to Approve Distribution of Funds.
8. I agree with the distribution of the settlement funds as set forth in the Motion relating to the attorney contingency fee distribution, reimbursement of the advanced costs to the attorneys, the repayment of the Oasis lien that I was at all times aware and approved to have been

received by Janet Godinez for the benefit of the heirs and the estate, and the equal distribution to each of the five heirs.

9. I have signed this affidavit voluntarily and on my own free will.

10. All facts in this affidavit is based on my personal knowledge.

AFFAINT SAYETH NAUGHT



Juan Godinez

Subscribed and sworn to before me on

This 12th day of December, 2019

